

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:	)	Chapter 11
	)	
CIRCUIT CITY STORES, INC., et al.,	)	Case No. 08-35653-KRH
	)	Jointly Administered
Debtors.	)	

**MOTION FOR ADMISSION**  
**PRO HAC VICE OF SAMUEL E. KRAMER**

Michael E. Hastings (“Movant”) hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Samuel E. Kramer (“Mr. Kramer”), to appear pro hac vice in the referenced bankruptcy case before the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Case”) to represent Eastern Security Corp. (“Eastern”), an unsecured creditor and administrative claimant, and in support of this Motion, the Movant states as follows:

1. Movant is a member in good standing of the Bar of the Supreme Court of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. Mr. Kramer is a member in good standing of the State Bar of New York. He is an attorney admitted to practice before the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, and the United States District Court for the Western District of New York. There are no disciplinary proceedings pending against Mr. Kramer in any jurisdiction in which he is admitted to practice.

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Michael E. Hastings (Va. Bar No. 36090)  
LeClairRyan, A Professional Corporation  
1800 Wachovia Tower, Drawer 1200  
Roanoke, Virginia 24006  
(540) 777-3065  
(540) 510-3050 (facsimile)

Counsel for Eastern Security Corp.

3. Movant requests that this Court authorize Mr. Kramer to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of Eastern.

4. Movant and his law firm shall serve as co-counsel with Mr. Kramer in the Bankruptcy Case (and related proceedings).

5. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) to counsel for the Debtors, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Samuel E. Kramer to appear pro hac vice in the Bankruptcy Case in substantially the same form as Exhibit A attached hereto and grant such other and further relief as is just.

/s/ Michael E. Hastings  
Movant

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Counsel for Eastern Security Corp.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of March 2009, a true and correct copy of the foregoing was served on the United States Trustee, counsel for the Debtors, and all persons receiving electronic notice in these cases.

/s/ Michael E. Hastings  
Movant

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In re:	)	Chapter 11
	)	
CIRCUIT CITY STORES, INC., et al.,	)	Case No. 08-35653-KRH
	)	Jointly Administered
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**ORDER GRANTING MOTION FOR  
ADMISSION PRO HAC VICE OF SAMUEL E. KRAMER**

The matter came before the Court upon the Motion for Admission Pro Hac Vice of Samuel E. Kramer (the "Motion") filed by Michael E. Hastings, seeking admission pro hac vice for Samuel E. Kramer in the above-styled bankruptcy case (the "Bankruptcy Case") pursuant to local Bankruptcy Rule 2090-1(E). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further notice is necessary or required, and it is appropriate that Samuel E. Kramer be authorized to practice pro hac vice before the Court in this Bankruptcy Case, it is hereby

ORDERED as follows:

1. The Motion be and hereby is granted.
2. Samuel E. Kramer is hereby admitted to appear in this Bankruptcy Case and any related proceedings pro hac vice pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of Eastern Security Corp.

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Counsel for Eastern Security Corp.

ENTERED:

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UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

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Michael E. Hastings (Va. Bar No. 36090)  
LeClairRyan, A Professional Corporation  
1800 Wachovia Tower, Drawer 1200  
Roanoke, Virginia 24006  
(540) 777-3065  
(540) 510-3050 (facsimile)

Counsel for Eastern Security Corp.

**Rule 9022-1 Certification**

I hereby certify that the foregoing has either been endorsed by or served upon all necessary parties.

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Movant